

**From:** Paul Cassell <[REDACTED]>

**Subject:** RE: supplemental discovery requests plus schedule moving forward

**Date:** Mon, 29 Aug 2016 19:12:55 +0000

**Importance:** Normal

**Attachments:** RFPS-supplement8-24-16-final.pdf; Supplemental\_RFAs-Final\_8-29-16.pdf

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Hi [REDACTED] and Co.,

Attached are a new set of RFPs and RFAs following up on some information we have received. We are happy to work with you on a schedule for production.

Also, in terms of the response to the pending summary judgment motion, we are (as always) happy to work on a good schedule for everyone.

We have seen a draft schedule for briefing which has the government going next on October 17, we response on November 21, and the government replies (on its summary judgment motion) on December 12. That schedule would still work for us, but we wanted you to have our latest discovery requests in hand before asking you to sign off on anything.

Again, happy to propose something to Judge Marra that works conveniently for everyone at your end.  
Paul Cassell for Jane Doe 1 and Jane Doe 2

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